

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

OCT 30 2019

David J. Bradley, Clerk of Court

United States of America

v.

Ganiyu Abayomi Jimoh

Case No.

H19-2036M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 7, 2019 and continuing in the county of Brazos in the
Southern District of Texas, the defendant(s) violated:

Code Section

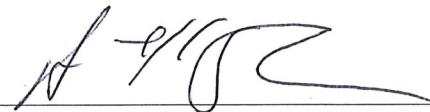
Offense Description

18 U.S.C. 1543

Forgery or False Use of a Passport

This criminal complaint is based on these facts:

See attached Affidavit of US Postal Inspector A.K. Shadowens

☒ Continued on the attached sheet.

Complainant's signature

AK Shadowens, US Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

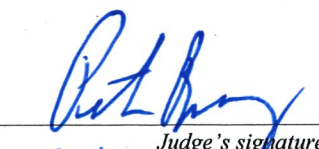
Date:

10/30/19

City and state:

Houston, Texas

Judge's signature


Peter Bray U.S.M.J.

Printed name and title

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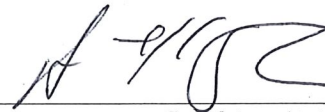
Offense Description

18 U.S.C. 1543

Forgery or False Use of a Passport

This criminal complaint is based on these facts:

See attached Affidavit of US Postal Inspector A.K. Shadowens

☒ Continued on the attached sheet.

Complainant's signature

A.K. Shadowens, US Postal Inspector
Printed name and title

Sworn to before me and signed in my presence.


Date:

10/30/19

City and state:

Houston, Texas

Judge's signature


Peter Bray U.S.M.J.
Printed name and title

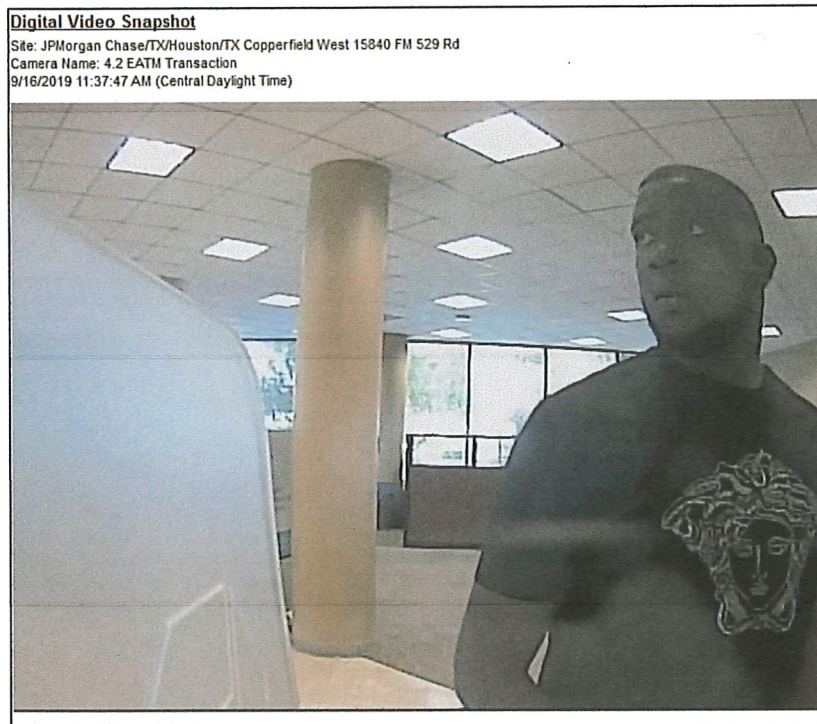
AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

1. Your Affiant, A.K. Shadowens, is employed as a federal law enforcement officer by the United States Postal Inspection Service. Affiant has been employed as a federal law enforcement officer since 2013 and is assigned to the Financial Crimes team in the Houston Division of the United States Postal Inspection Service. Affiant is responsible for conducting and has conducted many investigations into fraud, identity theft, and related “white collar” types of offenses. Affiant is a Certified Fraud Examiner and has received training in numerous Postal crimes, but primarily those involving “identity theft” and mail fraud related offenses. Affiant is authorized to obtain and execute Federal arrest and search warrants.
2. The information contained within this Affidavit is based upon information your Affiant has gained from his investigation, personal observations, training and experience, and/or information provided to your Affiant by other Postal Inspectors, law enforcement officers and/or agents, and fraud investigators.
3. This Affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all of Affiant’s knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and states described in this Affidavit are in substance and in part only.
4. Affiant knows from training and experience that a “romance scam” is a confidence trick fraud during which fraudsters create fake online profiles to take advantage of individuals looking for romantic partners by feigning romantic intentions towards a victim on dating websites, apps, or social media, gaining the victim’s affection and using that goodwill to commit fraud by obtaining access to the victim’s money, bank accounts, credit cards, passports, e-mail accounts, or personal identifying information.
5. Affiant solemnly swears and has reason to believe and does believe that **GANIYU ABAYOMI JIMOH**, an African-American male, date of birth March 22, 1993 (hereinafter referred to as “**DEFENDANT**”) on or about May 7, 2019 and September 11, 2019, in the Southern District of Texas, and elsewhere, did willfully and knowingly use, or attempt to use, a false, forged, counterfeited, mutilated, or altered passport in violation of Title 18, United States Code, Section 1543 (Forgery or False Use of a Passport).
6. On or about October 10, 2019, Affiant was contacted by Dawn Hardwick, whom Affiant knows to be an investigator with JP Morgan Chase Bank and finds to be reliable and credible. Hardwick advised she had identified two (2) Chase Bank accounts opened with counterfeit passports, which Affiant later found had received funds from reported fraudulent activity. Hardwick provided supporting documents, which Affiant reviewed and found the following:

- [illegible]

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ending in 2850 at a Chase ATM located 15840 FM 529, Houston, Harris County, Texas 77095. An ATM surveillance image of **DEFENDANT** conducting this transaction is seen below.

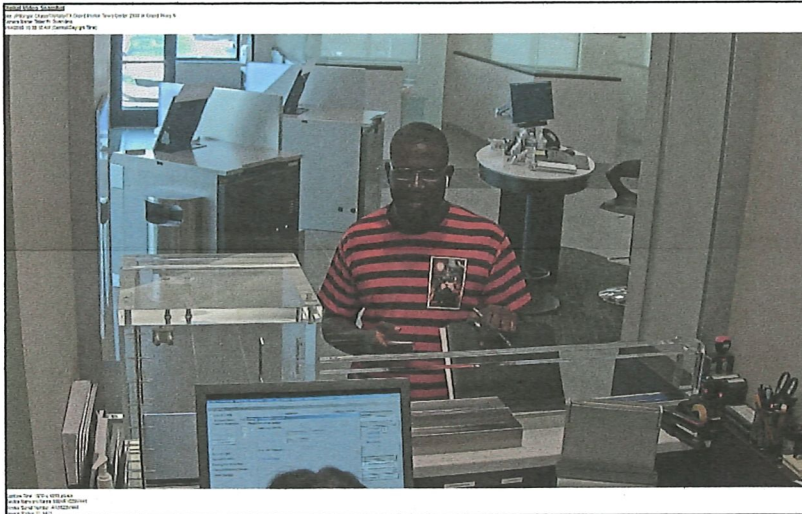


10. Affiant made contact with Special Agent Katherine Langston, whom Affiant knows to be employed as a Special Agent with the U.S. Diplomatic Security Service and knows to be reliable and credible. SA Langston advised Affiant that there is no record of any individual entering the United States with the above-described Kenyan passport in the name of Denzel Zulu.

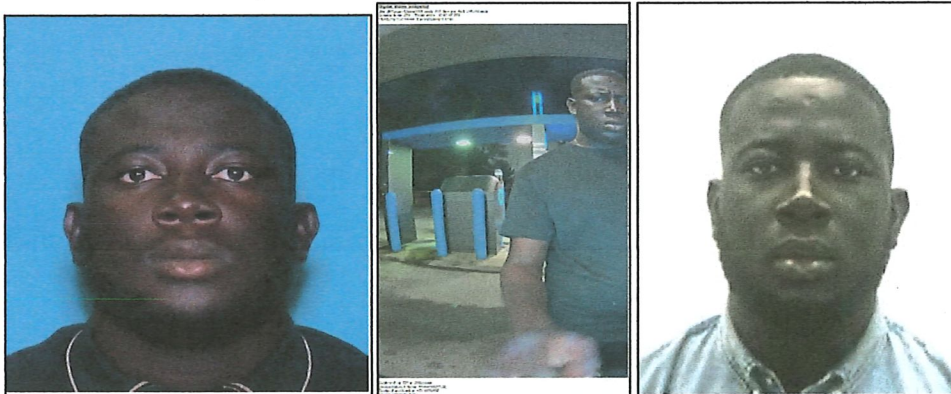
Chase Bank Accounts 1316 and 9222 – Mikel Johnson

11. On or about September 11, 2019, Chase Bank checking account ending in 1316 and Chase Bank savings account ending in 9222 were opened by **DEFENDANT** posing as Mikel Johnson at the Chase Bank located at 2335 Boonville Road, Bryan, Texas 77808, located within the Southern District of Texas. At the time of account opening, **DEFENDANT** presented a counterfeit passport in the name of Mikel Johnson purporting to have been issued by the Republic of Senegal, which is seen below.

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14. SA Langston advised Affiant that there is no record of any individual entering the United States with the above-described Senegalese passport in the name of Mikel Johnson.
15. On or about October 16, 2019, Hardwick advised she had identified phone number 281-310-7066 as being associated to the Zulu account. Hardwick stated that according to Chase records, this phone number was also associated to **DEFENDANT'S** true name Chase Bank account. Affiant researched the phone number through the CLEAR law enforcement database and found it is associated to **DEFENDANT**.
16. Affiant obtained the known Texas driver's license image of **DEFENDANT**, which is seen below. Hardwick provided Affiant with still surveillance images of **DEFENDANT** conducting transactions on his true name account, one of which is seen below. Affiant further obtained a known immigration photograph from SA Langston of **DEFENDANT**, seen below. Affiant reviewed these images in comparison to the bank and ATM surveillance images above, as well as the images on the counterfeit passports. Affiant believes and has reason to believe the individual seen in the images posing as Denzel Zulu and Mikel Johnson is **DEFENDANT**, Ganiyu Abayomi Jimoh.

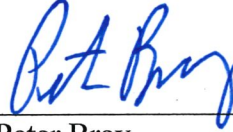


17. Based upon the foregoing, Affiant believes there is probable cause that **GANIYU ABAYOMI JIMOH** has committed crimes in violation of Title 18, United States Code, Section 1543 (Forgery or False Use of a Passport).



A.K. Shadowens
United States Postal Inspector

Sworn and Subscribed to me this 30 day of October, 2019 and I find probable cause.



Peter Bray
United States Magistrate Judge
Southern District of Texas